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Broad-Scale Assessments Could Be Better Integrated Into the Forest Planning Process

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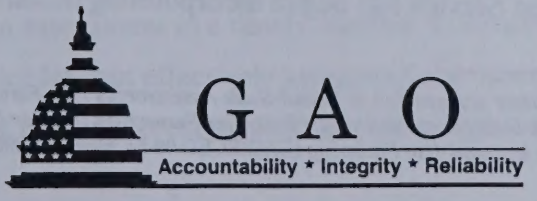

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Madam Chairman and Members of the Subcommittee:

We are pleased to be here today to discuss the integration of broad-scale assessments into the process used by the Department of Agriculture's Forest Service to amend or revise its forest plans. Broad-scale assessments collect and analyze data and then draw conclusions about issues and conditions that extend beyond the administrative boundaries of national forests. These issues can be ecological--such as the threat of catastrophic wildfire, infestations by insects and disease, and the health of wide-ranging species—or socioeconomic—such as the supply of timber or recreational opportunities.

Our statement will summarize (1) the role of broad-scale assessments in the agency's planning process, (2) the lessons that have been learned about conducting such assessments, and (3) the importance of holding Forest Service managers accountable for integrating the assessments into their planning processes. Our comments are based primarily on two reports issued within the last year.[1]

In summary, Madam Chairman:

- Broad-scale assessments now fill a critical void that existed in the Forest Service's planning process as it developed its initial set of forest plans between 1979 and 1995. During that period, the agency lacked the ability to adequately address ecological, economic, and social issues that extended beyond the boundaries of the national forests. Without this ability, the planning process was often characterized by inefficiency and waste as individual national forests independently attempted to gather and analyze often noncomparable data and parties successfully challenged forest plans and projects, causing the Forest Service to delay, amend, and withdraw them. As the Forest Service has begun incorporating broad-scale assessments into its

[1] *Forest Service Planning: Better Integration of Broad-Scale Assessments Into Forest Plans Is Needed* (GAO/RCED-00-56, February 15, 2000) and *Ecosystem Planning: Northwest Forest and Interior Columbia River Basin Plans Demonstrate Improvements in Land-Use Planning* (GAO/RCED-99-64, May 26, 1999).

forest plans, it has been more successful in identifying and analyzing these issues and in defining management alternatives.

- Experience with broad-scale assessments to date has shown that they need to include certain key elements if they are to maximize their value in helping managers reach decisions on how best to manage federal lands and resources. In particular, as we found in our review of assessments in the northwest and the Great Lakes, they need to have clear objectives, identifiable products, firm deadlines, and realistic cost estimates. Experience has also shown that they need to:

  --be open and accessible to all interested and affected federal and nonfederal parties;

  --occur early in the process of amending or revising a forest plan so that issues can be identified, data gathered and analyzed, and conclusions drawn before management alternatives are identified and proposed; and

  --identify the range of ecologically viable and legally sufficient management alternatives, but not result in decisions.

- Our work over the past 5 years has shown that in amending or revising their plans, Forest Service managers need to address ecological and socioeconomic issues that extend beyond the boundaries of national forests. Doing so is necessary for them to comply with laws such as the Endangered Species Act and the National Environmental Policy Act. Yet despite the recognized benefits of broad-scale assessments in addressing these issues, some Forest Service officials still do not view assessments as a priority, and have not been held accountable for doing assessments properly. Thus, they have not provided the leadership, guidance, and funding necessary to complete an assessment in a timely manner. For instance, in our opinion, the Forest Service has not effectively integrated the assessment for the Great Lakes into its process for revising forest plans in the Lake States region of Michigan,

Minnesota, and Wisconsin. As a result, the process may be vulnerable to the same inefficiency and waste that earlier plagued forest plans.

To address this problem, we recommended in our February 2000 report that the Forest Service revise its planning regulations to maximize the value of broad-scale assessments and better integrate them into its planning process. While the Forest Service generally agreed with us that assessments are an important component of the forest planning process, it did not agree with our recommendations. For example, the Forest Service has chosen to leave the decision on whether to conduct an assessment to the discretion of its independent and highly autonomous forest offices. Nor does the agency plan to revise its planning regulations to spell out the characteristics that we believe are essential for a successful assessment. We continue to believe that following these recommendations would increase the likelihood that assessments would be properly done.

Broad-Scale Assessments Fill a Critical Void in the Forest Service's Planning Process

To be useful, the Forest Service's planning process needs to help land managers make decisions about a spectrum of issues, both local—such as the placement of a campsite—and regional—such as the quantity of old-growth forest. In the past, the Forest Service's planning process did not adequately address ecological issues—from costly outbreaks of wildfires, insects, and diseases; invasions of exotic weeds; declines in soil fertility and water and air quality; and the habitat requirements of wide-ranging rare species, such as anadromous fish, the grizzly bear, and the lynx—that often extend beyond forest boundaries. Similarly, the process did not adequately address social and economic issues—including the flow of timber, livestock forage, and other commodities as well as the growing demand for developed and dispersed recreation opportunities—that increasingly require the Forest Service to look beyond its jurisdiction for solutions.

The initial set of forest plans—from 1979 to 1995—was costly and time-consuming to develop, and the agency often failed to achieve planned objectives.[2] These difficulties occurred, in part, because the agency lacked the data and technology to adequately address broad-scale ecological and socioeconomic issues. As a result, broad-scale assessments were not conducted and/or individual national forests independently attempted to gather and analyze often noncomparable data. Plans and projects developed without sound information on broad-scale issues have been challenged for not satisfying the requirements of environmental and other laws--including the Endangered Species Act and the National Environmental Policy Act--and courts have required the agency to delay, amend, or withdraw them. Moreover, inefficiency and waste within the planning and decision-making process, including the need to respond to legal challenges, have cost taxpayers hundreds of millions of dollars.

As the Forest Service continues to revise the forest plans, we believe it is essential that it improves how it addresses issues that extend beyond the boundaries of national forests. During the past decade, the Forest Service has taken several steps to improve its planning process in a way that will enable it to address these issues. For example, the agency has begun to use broad-scale assessments to (1) support decisions that apply simultaneously to multiple forests, such as those in the Pacific Northwest and the interior Columbia River basin and (2) revise individual forest plans, such as those for the Great Lakes region and the southern portion of the Appalachian Mountains. The agency has also begun to use satellite imagery, geographic information systems, and desktop computer technology to gather, interpret, and manipulate detailed data to support the assessments.

Lessons Learned About Conducting Broad-Scale Assessments Increase Their Value to Forest Planning

Early efforts to integrate broad-scale assessments into the processes being used by the Forest Service to amend or revise forest plans have provided useful lessons to the Forest

[2] See *Forest Service Decision-Making: A Framework for Improving Performance* (GAO/RCED-97-71, Apr. 29, 1997).

Service and others about conducting such assessments. These lessons learned--or best practices—demonstrate that to be most useful an assessment must have clear objectives, identifiable products, firm deadlines, and realistic cost estimates and be open and accessible to all interested and affected federal and nonfederal parties.

For instance, broad-scale assessments can save both time and money if they eliminate duplicative data gathering and analysis by individual national forests, make data gathered by a variety of federal and nonfederal organizations more comparable, and/or increase the likelihood that the Forest Service will avoid or prevail against challenges to its plans and projects. However, the time and costs to do an assessment can vary widely depending on the number and complexity of the issues to be addressed, the amount of data to be gathered and analyzed, and the types of products to be delivered. For example, the assessment for the Pacific Northwest, which focused primarily on one issue—the northern spotted owl and other old-growth-dependent species—was completed in about 3 months and cost less than $3.5 million. By contrast, the assessment for the interior Columbia River basin--which addressed numerous ecological and socioeconomic issues--took several years and cost about $22.7 million. Federal funding and resources may not always be sufficient to cover all of the issues that could be addressed or to gather and analyze all of the potentially limitless ecological, economic, and social data that are available. Therefore, realistic objectives and estimates of resource needs–and of what products can be expected from an assessment given different funding levels–need to be identified before an assessment is begun.

On the basis of our review, we believe that the Forest Service also needs to make funding decisions in advance in order to accomplish an assessment's objectives. For example, the assessments for the Pacific Northwest and the interior Columbia River basin were identified for special funding in the Forest Service's fiscal year budget justifications, and money was withheld from the forests' annual budgets to fund the assessments. Conversely, the assessment for the Great Lakes has not had a secure source of funding. Instead, it has relied on funding from a variety of sources at various times for a variety of purposes. As a result, the assessment's objectives have, at one time or another, been

expanded to include activities that do not directly support the Lake States national forests in revising their plans and contracted to exclude other activities that would assist them in reaching more informed decisions.

Regardless of their scope of work, we and others who have reviewed assessments believe that they must occur early in the process to amend or revise a forest plan if they are to be useful to decisionmakers. That way, issues can be identified, data gathered and analyzed, and conclusions drawn before management alternatives are identified and proposed. However, the Forest Service has not always effectively integrated assessments into the process for amending or revising forest plans. For example, the assessment and the development of alternatives for managing Forest Service and other federal lands in the interior Columbia River basin were conducted concurrently, contributing to the false starts and delays that have plagued the planning process for that region.

Similarly, problems with the timing of the Great Lakes assessment have limited its effectiveness. In November 1999, several years after the Lake States national forests had begun to revise their forest plans and about a year before they were scheduled to issue draft management alternatives, they asked the Great Lakes assessment team to provide substantial additional information and analysis to support revisions to their plans. This included information on broad-scale issues identified by the forests as being important 4 years earlier, such as timber supply and habitat fragmentation. Only after this November 1999 request did the forest supervisors and the assessment team leader meet to discuss products, schedules, and costs for obtaining specific types of data and analyses the forests would need to finish revising their plans. The assessment team is not able to provide all of the data and analysis by the time they are needed under the current funding and staffing levels, according to the assessment team leader. In retrospect, officials responsible for the interior Columbia River basin plan and on the Great Lakes assessment team agree that an assessment should be completed before—rather than concurrently or after--planners identify and propose a range of management alternatives.

While assessments should help to identify the range of ecologically viable and legally sufficient management alternatives and should provide the information that people need for a productive discussion of the issues, they have not and should not result in decisions. As the Forest Service and others have observed, the mix of products and services provided on federal lands "is as much a social decision as it is a scientific one" and trade-offs among ecologically viable and legally sufficient management alternatives are ultimately made by society.

The Forest Service Should Hold Its Officials Accountable for Integrating Broad-Scale Assessments Into The Planning Process

In amending or revising their plans, Forest Service officials need to address ecological and socioeconomic issues that extend beyond the boundaries of national forests in order to comply with existing environmental and procedural laws. However, despite the recognized benefits of broad-scale assessments in addressing these issues, some Forest Service officials still do not view assessments as a priority. Thus, they have not always provided the leadership, guidance, and funding necessary to complete assessments in a timely manner.

For instance, in our opinion, Forest Service officials do not view the Great Lakes assessment as a priority and have not effectively integrated it into the process for revising forest plans in the Lake States. The agency's headquarters has not provided the region with any written guidance or directives on when to conduct an assessment or how to use its products. The region, in turn, has taken a "hands-off" approach and given the individual forest supervisors the discretion to use or not use the assessment as they see fit. Some forest supervisors told us that they were reluctant to support the assessment and some told us that they expected it to fail, so they provided only modest seed money to begin the assessment and/or sought to limit its scope by limiting its funding. As a result, the assessment team has had to seek funding from other sources and assume leadership by default.

On October 5, 1999, the Forest Service proposed revisions to its forest planning regulations. In light of the consensus on the value of broad-scale assessments in amending or revising forest plans and the lack of priority given by the agency to assessments, we see this effort as an opportunity to better integrate the assessments into the agency's process for amending or revising forest plans. Toward this end, our February 2000 report on broad-scale assessments included recommendations that, if implemented, would better ensure that assessments are effectively used in amending or revising forest plans. Specifically, we recommended that the regulations make clear that broad-scale assessments must be used in revising forest plans unless the region(s) and forest(s) can justify their omission. We also recommended that the regulations provide that when a decision is made to conduct an assessment, the region(s) and forest(s) must prepare a strategy that identifies, among other things, (1) how the assessment will be linked to the forest plan revision process, (2) how other governmental entities and the public will participate in the assessment, (3) what objectives the assessment will meet and what products it will generate, including those of the highest priority, and (4) how much the assessment will cost, how funding will be secured for it, and what is likely to happen if full funding is not available. These steps would also help hold Forest Service managers accountable for integrating broad-scale assessments into their planning processes and would institutionalize the lessons learned to date.

Although the Forest Service agreed with the desired outcome of our recommendations, it did not agree to revise the proposed planning regulations to make an assessment the rule rather than the exception in amending or revising a forest plan. The Forest Service believes that this is unnecessary because the intent of the proposed regulations is to base decisions on scientific data, including broad-scale data when appropriate. As a result, the regulations would generally leave the decision on whether to conduct an assessment to the discretion of the agency's individual forest supervisors.

Similarly, the agency does not plan to revise the proposed planning regulations to incorporate all of the lessons learned to date about integrating broad-scale assessments into its planning process, preferring instead to place such guidance in its manuals and

directives. As a result, the proposed regulations (1) do not state when in the planning process an assessment should occur, (2) are silent on the need for clear objectives and identifiable products, and (3) do not require the forests to identify their strategies for involving the public if an assessment is done.

Madam Chairman, as we have pointed out to you before, the Forest Service often agrees with the intent of our recommendations, but leaves their implementation to the discretion of its independent and highly autonomous regional and forest offices, which produces mixed results.[3] We are concerned that the Forest Service will continue to allow individual forest supervisors to use or not to use broad-scale assessments as they see fit without having to first weigh their benefits and costs. We are also concerned that this pattern of behavior, if applied to implementation of broad-scale assessments, could diminish their potential and ultimately represent a lost opportunity.

Madam Chairman, that concludes my formal statement. If you or other Members of the Subcommittee have any questions, we will be pleased to respond to them.

Contact and Acknowledgment

For future contacts regarding this testimony, please contact Barry T. Hill on (202) 512-3841. Individuals making key contributions to this testimony and/or to the two reports on which it was primarily based include Ross Campbell, Charles S. Cotton, Charles T. Egan, Elizabeth R. Eisenstadt, Doreen Stolzenberg Feldman, Dena M. Owens, and Cheryl Pilatzke.

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[3] See, for example, *Forest Service: Lack of Financial and Performance Accountability Has Resulted in Inefficiency and Waste* (GAO/T-RCED/AIMD-98-135, Mar. 26, 1998).

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